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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

AMY BUCHANAN,

Plaintiff,

vs.

WATKINS & LETOFSKY, LLP, a Nevada
Limited-Liability Partnership; DOES I-X;
ROE BUSINESS ENTITIES I-X,

Defendants.

CASE NO. 2:19-cv-00226-GMN-VCF

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
RESPOND TO DEFENDANT'S MOTION
FOR SUMMARY JUDGMENT**

(First Request)

The parties, by and through their respective counsel, hereby stipulate to extend the time for Plaintiff to respond to the Defendant's Motion for Summary Judgment (ECF No. 28) from the current due date of Wednesday, April 15, 2020 through and including **Wednesday, April 29, 2020.**

This is the first request for an extension of this deadline. The parties provide the following information to the Court regarding the proposed extension of time:

1. Plaintiff's counsel's office had been operating on a reduced schedule due to the COVID-19 pandemic restrictions and recommendations. In particular, one staff member has had to be on a 14-day quarantine upon his return

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1 from unavoidable out of state travel to assist his elderly parents and is not
2 due to return to work until at least Monday, April 20, 2020. He is on the
3 new paid sick leave mandated by the Families First Coronavirus Response
4 Act.

5
6 2. Additionally, Plaintiff's counsel is has had, and is facing, a very heavy
7 workload with respect to briefing. This is one of TWO Summary
8 Judgment motions that were filed in counsel's cases on March 25, 2020
9 making both due the same day. Both are in need of extensions because
10 Plaintiff's counsel has had, or has upcoming, the following substantial
11 briefings due in other cases:

- 12
13 a. Opening Brief on State Court Judicial Review Petition 3/26/2020;
14
15 b. Three Oppositions to Motions to Dismiss in a case pending before
16 Judge Dorsey on April 8, 2020;
17
18 c. Supreme Court of Nevada mediation brief on April 8, 2020;
19
20 d. Opening Brief on State Court Judicial Review Petition April 10, 2020;
21
22 e. Reply Brief due on Ninth Circuit appeal April 20, 2020;
23
24 f. Opening Brief on State Court Judicial Review Petition April 20, 2020;
25
26 g. Reply to Opposition to Motion to Dismiss in Bankruptcy Court April
27 21, 2020;
28
h. Summary Judgment Opposition due in C.D. California case May 22,
2020;

These are all significant matters most of which requiring appellate level
briefing. Additionally, Plaintiff's counsel has had to respond to extensive

discovery requests that are due in the next two weeks, has had to file new cases or amended pleadings to respond to motions to dismiss, and continue to advise and consult new clients by telephone including assisting them with filing discrimination charges with Nevada Equal Rights Commission and EEOC. Being short staffed, running reduced hours to socially distance, and the heavy workload set forth above necessitates more time to respond to the Motion for Summary Judgment in this case.

This stipulation to extend the deadline is made in good faith and not for purposes of delay.

DATED this 15th day of April, 2020.

DATED this 15th day of April, 2020.

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ORDER

IT IS SO ORDERED.

Dated this 16 day of April, 2020.



Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT

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